Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist

Facility:	Process(es) Covered:	Date:

V. TRAINING PROGRAM

A. PROCEDURE/POLICY REVIEW

1) EXISTENCE OF TRAINING PROGRAM	NAC Ref.	Resp. Code
Do training records indicate that training is being conducted pursuant to CAPP? (all requirements of section 2 through 7 must be met)	459.95418	

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2) SCOPE OF INITIAL TRAINING	NAC Ref.	Resp. Code
Do the subjects covered by initial training include: i. An overview of the process?	459.95418(1)	
ii. Relevant operating procedures?	459.95418(1)	
iii. Plant layout?	459.95418(1)	
iv. Location of equipment and instruments?	459.95418(1)	
v. Specific safety and health hazards?	459.95418(1)	
vi. Emergency operations and emergency shutdown?	459.95418(1)	
vii. Relevant safe work practices?	459.95418(1)	
viii. Management of Change program?	459.95418(1)	

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Notes/Comments Pertaining to Responses to Questions under Issue 2):

3) **SCOPE OF REFRESHER TRAINING**	**NAC Ref.**	**Resp. Code**
i. Has the scope of operator refresher training been defined?	459.95418(3)	
ii. Is the frequency of the refresher training limited to maximum of 3 years?	459.95418(3)	
iii. Is there a mechanism that solicits employee input on refresher training scope and frequency?	459.95418(3)	

Notes/Comments Pertaining to Responses to Questions under Issue 3):

4) **AREAS OF TRAINING**	**NAC Ref.**	**Resp. Code**
i. Is there a Training Syllabus for EACH position that operates this process, related to Initial Training?	459.95418(4)	
ii. Is there a Training Syllabus for EACH position that operates this process, related to Refresher Training?	459.95418(4)	
iii. Are the training sessions and associated training materials provided in a language understandable to all employees requiring training under this section?	459.95418	

Notes/Comments Pertaining to Responses to Questions under Issue 4):

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5)	EVALUATION OF EMPLOYEE COMPREHENSION OF TRAINING	NAC Ref.	Resp. Code
i.	Does the facility ascertain whether each employee involved in operating a process has comprehended the training?	459.95418(5)	
ii.	Whether oral, written, observation of job performance, or a combination of methods is used to determine comprehension, is the test content documented (note: even an oral test administered in the field must have documented criteria for evaluation)?	459.95418(6)	
iii.	Is a Passing/Failing criteria established for each test?	459.95418(5)	
iv.	Is performance of the employee in the defined operational position dependent upon achieving a passing score on the comprehension test?	459.95418(5)	
v.	Is employee comprehension evaluated for both Initial and Refresher Training?	459.95418(5)	

Notes/Comments Pertaining to Responses to Questions under Issue 5):

6)	TRAINING DOCUMENTATION	NAC Ref.	Resp. Code
i.	Does the facility maintain Records of the Training required by this section for each employee involved in operating the process?	459.95418(6)	
ii.	Do the Training Records include: - The identity of the employee - The date of training - The substance of the training provided on that date - The means used to verify that the employee comprehended the training (testing records)?	459.95418(6)	

Notes/Comments Pertaining to Responses to Questions under Issue 6):

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7)	VERIFICATION OF TRAINING AND COMPREHENSION RECORDS	NAC Ref.	Resp. Code
i.	Does the review of actual training records from Part B indicate that INITIAL and REFRESHER TRAINING is being conducted pursuant to CAPP requirements?	459.95418 (1) & (3)	
ii.	Does the review of actual records from Part B indicate that employees have been consulted on the scope and frequency of refresher training?	459.95418(3)	
iii.	Does the review of actual training records from Part B indicate that COMPERSHENSION of initial and refresher training is being evaluated pursuant to CAPP requirements?	459.95418(5)	

Notes/Comments Pertaining to Responses to Questions under Issue 7):

General Procedure/Policy Review Notes/Comments:

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B. ON-SITE INSPECTION - RECORDS AUDIT

1) SELECT 2 TO 4 TRAINING FILES/RECORDS TO REVIEW AGAINST ACTUAL PRACTICE. (Attempt to represent records for initial and refresher training).
LIST ON THE FOLLOWING TABLE:

#	Employee ID # or Name	Description -Title of Operator Position (note initial or refresher training)
i		
ii		
iii		
iv		

Inquiry/Observation ('Y' Indicates presence of training record and successful comprehension evaluation)	Resp. Code:			
	i	ii	iii	iv
Relevant General Facility & Process Knowledge				
a. Overview of the process (including process flows, equipment & instruments involved, key operating variables, reading process flow diagrams, reading piping & instrument diagrams)				
b. Layout of the plant (e.g., physical layout of process, including pipe routing)				
c. Location of equipment, controls and instruments				
d. Specific safety & health hazards				
e. Management of Change				
Relevant Standard Operating Procedures (also refer to NAC 459.95416)				
f. Initial Start-Up procedures (for commissioning of new process)				
g. Normal Operating procedures				
h. Temporary Operating procedures				
i. Emergency Shut-Down procedures				
j. Emergency Operating procedures				
k. Normal Shut-Down procedure for Turnaround				
l. Shut-Down procedure to place in Standby Mode of Operation (i.e., Warm Shut-Down)				
m. Start-Up procedure following a Turnaround				
n. Start-Up procedure following an Emergency Shut-Down or Warm Shut-Down				
o. Safe Operating Limits				

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p.	Safety and Health considerations				
q.	Safety System Description (SSD)				
Relevant Safe Work Practices (also refer to NAC 459.95416 & 459.95433)					
r.	Lock-Out/Tag-Out (Control of Hazardous Energy)				
s.	Confined Space Entry				
t.	Opening Process Equipment or Piping (Linebreaking)				
u.	Entrance into the facility and/or specific process area(s) by maintenance, contractor, or other support personnel (Controlled Access)				
v.	Hot Work				
w.	Other Safe Work Practices				
Adequacy of Records					
x.	Does the employee training record meet the requirements of this section?				
Non-Mandatory Training Topics					
1.	CAPP Elements (refer to NAC 459.95412 thru 459.95442) (Note: While training on the intent of each of the CAPP elements is not mandated by regulation, employee understanding of these elements is critical to ensure effective element implementation, which IS mandated by CAPP)				
2.	Basic Math and Science				
3.	Process Fundamentals training (overview of chemical plant equipment and instruments)				
4.	Advanced technical training using outside materials and/or trainers, such as from the Refrigeration Engineers & Technicians Assoc. (RETA), the Chlorine Institute (CI), the Chemical Manufacturers Assoc. (CMA), etc.				

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2)	**EMPLOYEE CONSULTATION**	**Resp. Code**
	Is there documentation indicating that employees have been consulted on frequency and scope of refresher training?	

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Notes/Comments Pertaining to Responses to Questions under Issue 2):

General On-Site Inspection and Records Audit Notes/Comments:

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C. INTERVIEWS

1) **SELECT TWO OR MORE OPERATING PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE TRAINING PROGRAM USING THE FOLLOWING QUESTION SETS.** (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)

Question Set	Question Options/Phrasing
a	What is your job description and associated tasks?
b	Describe the type of training that you have been provided. Were you tested? What kind of safety & health training have you had?
c	Can you explain how the process works (get walkthrough with explanation of main process flows, safety systems and controls plus a general description of their duties)? Do you feel that the training was adequate in this area? Suggested improvements?
d	Do you issue Hot Work, Confined Space, etc, permits to perform work in your process area? What is your role in implementing [*select a safe work practice*] (look for an understanding of the permit system, how they perform their task and the responsibilities of other parties)?
e	Have you ever received refresher training? Were you involved in determining the frequency and scope of refresher training? Is refresher training adequate?
f	Do you feel that the tests adequately evaluated your knowledge of the training (were the tests too easy, could they be passed without adequate knowledge of the process and procedures)? Is performance of your duties contingent upon passing the tests?

2) RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS			
Employee Profile			
Job Title/Position	**Department/Unit/Group**	**Time in Job**	**Time w/Co.**

Response to Question Set _:

Response to Question Set _:

Response to Question Set _:

Response to Question Set _: